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RULES CLEARINGHOUSE

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CLEARINGHOUSE RULE 95-078

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]

1. Statutory Authority

In s. Med 19.02 (11) and (12), the changes made by the rule are inconsistent with provisions in s. 448.05 (5m), Stats. It is assumed that the changes are proposed because the entities referenced in the existing rule and statute are out of date. The department’s analysis should indicate why the rule and statute are inconsistent.

2. Form, Style and Placement in Administrative Code

In s. Med 19.02 (10m), should “occupational” precede “performance” since “occupational performance areas” is defined in sub. (9)?

5. Clarity, Grammar, Punctuation and Use of Plain Language

The department’s analysis should provide more detail about the nature of the changes in the rule. In addition, the minimal information given in the analysis is not always accurate; for example, SECTION 1 does not “create” the definition of “occupational performance components.” A review of the analysis is in order.